

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

DAVID NIELSEN, parent and next
friend, on behalf of his minor child, **S.N.**,
and the **SKYLINE REPUBLICAN
CLUB**,

Case No. 22-cv-12632

Hon. Paul D. Borman

Plaintiffs,

v.

ANN ARBOR PUBLIC SCHOOLS,
CORY McELMEEL, individually and
in his official capacity as the principal
of Skyline High School, and
JEFFERSON BILSBORROW,
individually and in his official capacity
as a secretary at Skyline High School,

Defendants.

SUPPLEMENTAL DECLARATION OF S.N.

I, S.N., a Plaintiff in this action and a minor, make this declaration pursuant to 28 U.S.C. § 1746 based upon my personal knowledge unless otherwise noted. I understand what it means to tell the truth.

1. My name is S.N.
2. I am a Senior at Skyline High School in Ann Arbor, Michigan.
3. I am the President of the Skyline Republicans, which is an officially recognized student club at Skyline High School.

4. I celebrate that officials, employees, and students at Skyline High School express their viewpoints and speech; however, I have noticed that school officials and employees can be hostile, unwelcoming, and engage in censorship of conservative viewpoints. This is widespread and, at times, obvious.

5. I have witnessed on many occasions that the Skyline Republican Club has not received equal treatment as other groups.

6. I have also noticed that my political viewpoint and those expressed by the Skyline Republican Club have been censored or treated with hostility, or simply treated worse than left-leaning political views by officials and employees of Skyline High School.

7. Skyline Republican Club is an unincorporated, voluntary association. It has no official ties to the Republican party.

8. Skyline Republican Club an independent student association, not associated with any other Republican organization, campaign, committee etc. at any level, neither local, state, nor national.

9. I seek for myself and for Skyline Republican Club the same access, benefits, treatment, and privileges of other non-curriculum related student groups receive at Skyline High School.

10. Skyline Republican Club became a recognized non-curriculum student group in 2019. It only meets during non-instructional time.

11. I ensured the renewal of the club's recognized status on the morning of October 21, 2022.

12. My renewal of the club's status was entered and recognized prior to Skyline High School rejecting my proposed announcement.

13. This is confirmed by my interactions with the teachers and staff at Skyline High School.

14. It is also confirmed by the email I received at 9:11am on the morning of October 21, 2022, which recognized that "the club was back on the list" and then stated that the basis for my proposed announcement being rejected was "due to its political nature."

15. Announcements were not read until 9:16am on Friday, October 21, 2022, which is the regular schedule for morning announcements at Skyline High School on Fridays.

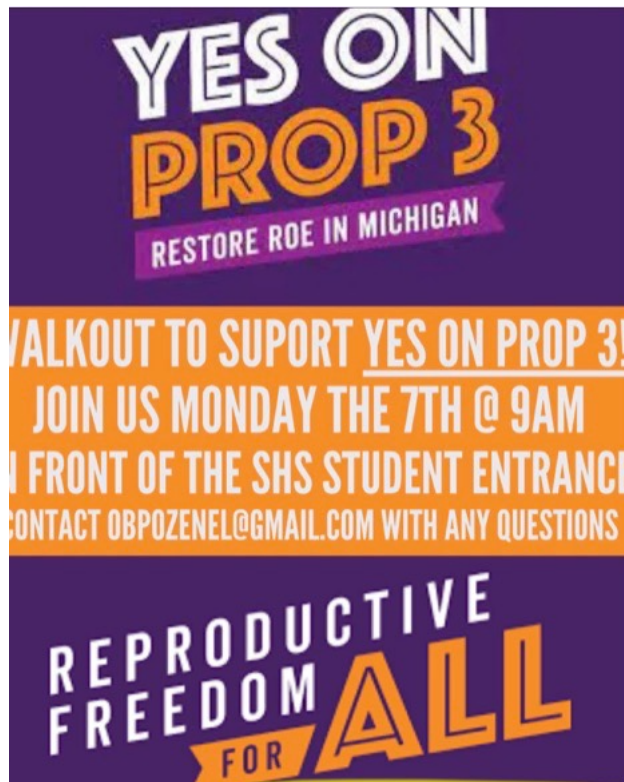
16. Skyline High School allows "Vote Yes on Proposal 3" student speech and pro-abortion rights and Planned Parenthood rhetoric.

17. The other side of the debate (not in support of Proposal 3 or holding concerns about Proposal 3) has not been allowed equal time.

18. It is widely recognized that the student club, the National Organization of Women (NOW), will host a walk-out this Monday, November 7, 2022 in support of voting yes on Proposal 3.

19. Officials and employees have organized this with NOW.

20. Digital flyers have been shared over email and throughout the school day. Here is the flyer:



21. Speech representing the other side of the Proposal 3 debate has not been allowed at Skyline High School.

22. The announcement I submitted on behalf of the Skyline Republican Club on October 21, 2022 had the purpose of attracting

students to help with canvassing and handing out literature on election day.

23. Specifically, the purpose of the announcement was to get students involved in a gathering at a park in Plymouth, Michigan on October 29, 2022 to canvass and to try to organize efforts the following weekend and on election day. These events were independent, volunteer, student-led efforts, not attached to any official campaign or committee.

24. Skyline High School has allowed speech on the other side of this debate (proponents of Proposal 3) through multiple channels but has not allowed any speech on the other side of the issue.

25. This is unsurprising given the history of how certain viewpoints have been treated throughout my high school career at Skyline High School. Unfortunately, there is a repeated and palpable bias for viewpoints, such as a conservative or Republican political viewpoint, from the officials and employees at Skyline High School.

26. I seek for Skyline High School to simply allow for the other side of the debate.

27. For example, on October 28, 2022, Skyline High School allowed NOW to announce their Instagram page to find out the

candidates they support in the upcoming election. I visited the Instagram address shared over the announcements. It directs students to vote for certain political candidates in the upcoming November 8, 2022 elections.

28. Student speech shared over the morning announcements is understood to be the speech of the student clubs and the students. Students write these announcements, and they express the speech and opinion of the student clubs.

29. The student club's name is identified in the announcement, and it is known that Skyline High School has opened this channel of communication for the student clubs to write their own announcements to express their own viewpoint, not an official viewpoint of the school.

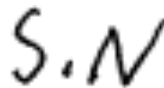
30. For example, when Skyline High School allowed the NOW to check out their list of candidates who students should vote for, it was understood that NOW was using the school's announcements to promote the candidates they supported, and it was not the school telling students to vote for candidates.

31. Similarly, if the Skyline Republican Club were allowed to post their message, it would be understood that the announcement was the

speech and expressed the viewpoint of the Skyline Republican Club and not any official position of the school, the school district, or officials or employees of the school.

I declare under penalty of perjury under the laws of the United States and the State of Michigan that the foregoing is true and correct.

Executed this 4th day of November in 2022, in Ann Arbor, Michigan



S.N.



David Nielsen, Parent and Next Friend
of S.N.

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2022, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record. Furthermore, I will send the electronically filed foregoing paper via First Class Mail and by electronic mail to:

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THOMAS MORE LAW CENTER

/s/ Richard Thompson
Richard Thompson